

# PARTNERSHIP HEALTHPLAN OF CALIFORNIA

## POLICY/ PROCEDURE

<b>Policy/Procedure Number:</b> MPQP1008 (previously QP100108 & KK Q1201)			<b>Lead Department:</b> Health Services Business Unit: Quality Improvement	
<b>Policy/Procedure Title:</b> Conflict of Interest Policy for QI Activities			<input checked="" type="checkbox"/> <b>External Policy</b> <input type="checkbox"/> <b>Internal Policy</b>	
<b>Original Date:</b> 04/25/1994		<b>Next Review Date:</b> 08/13/2026 <b>Last Review Date:</b> 08/13/2025		
<b>Applies to:</b>	<input type="checkbox"/> <b>Employees</b>	<input checked="" type="checkbox"/> <b>Medi-Cal</b>	<input checked="" type="checkbox"/> <b>Partnership Advantage</b>	
<b>Reviewing Entities:</b>	<input type="checkbox"/> <b>IQI</b>	<input type="checkbox"/> <b>P &amp; T</b>	<input type="checkbox"/> <b>QUAC</b>	
	<input type="checkbox"/> <b>OPERATIONS</b>	<input type="checkbox"/> <b>EXECUTIVE</b>	<input type="checkbox"/> <b>COMPLIANCE</b>	<input type="checkbox"/> <b>DEPARTMENT</b>
<b>Approving Entities:</b>	<input type="checkbox"/> <b>BOARD</b>	<input type="checkbox"/> <b>COMPLIANCE</b>	<input type="checkbox"/> <b>FINANCE</b>	<input checked="" type="checkbox"/> <b>PAC</b>
	<input type="checkbox"/> <b>CEO</b> <input type="checkbox"/> <b>COO</b>	<input type="checkbox"/> <b>CREDENTIALS</b>	<input type="checkbox"/> <b>DEPT. DIRECTOR/OFFICER</b>	
<b>Approval Signature:</b> <i>Robert Moore, MD, MPH, MBA</i>			<b>Approval Date:</b> 08/13/2025	

**I. RELATED POLICIES:**

- A. CMP10 – Confidentiality
- B. MPQP1053 – Peer Review Committee
- C. MPQP1002 – Quality/Utilization Advisory Committee
- D. MPCR200 Credentialing Committee and CMO Credentialing Program Responsibilities

**II. IMPACTED DEPTS:**

- A. Health Services

**III. DEFINITIONS:**

N/A

**IV. ATTACHMENTS:**

- A. [Conflict of Interest Agreement](#)

**V. PURPOSE:**

To describe the mechanism to ensure that a conflict of interest does not exist when contracted providers, who are members of Partnership HealthPlan of California (Partnership) committees, perform peer review or quality improvement activities.

**VI. POLICY / PROCEDURE:**

- A. All non-Partnership persons involved in Partnership peer review activities or committees shall sign a conflict of interest statement annually.
- B. Conflict of interest is defined as any involvement in the care of the member involved in the review, any fiduciary interest or fiduciary relationship with the provider under review, or any other involvement in the case that may impact objectivity in performing the review. Note – a provider is a broad term that could include physicians or other direct care providers and vendors.
- C. Committee members or peer reviewers with a conflict of interest in a particular case will notify the Medical Director for Quality or the Committee Chair, and excuse themselves from receiving related materials and from participating in the review.
- D. Should a situation arise wherein this policy is not followed, the appropriate Committee and/or its Chair will determine appropriate action and notify the individuals(s) verbally and in writing.

**VII. REFERENCES:**

N/A

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**VIII. DISTRIBUTION:**

- A. Partnership Department Directors
- B. Partnership Provider Manual

**IX. PERSON RESPONSIBLE FOR IMPLEMENTING PROCEDURE:** Chief Medical Officer

**X. REVISION DATES:**

Medi-Cal

01/27/95; 10/10/97 (name change only); 12/98; 6/21/00; 05/16/01; 08/20/03; 09/15/04; 04/19/06; 04/18/07; 02/20/08; 03/18/09; 04/21/10; 08/15/12; 08/20/14; 09/16/15; 10/19/16; 11/15/17; \*10/10/18; 11/13/19; 11/11/20; 11/10/21; 11/09/22; 11/08/23; 11/13/24; 08/13/25

Partnership Advantage (effectiveness Jan. 1, 2027)

N/A

**PREVIOUSLY APPLIED TO:**

\*Through 2017, Approval Date reflective of the Quality Utilization Advisory Committee meeting date.  
Effective January 2018, Approval Date reflects that of the Physician Advisory Committee's meeting date.

**PREVIOUSLY APPLIED TO:**

Partnership Advantage:

MPQP1008 - 04/18/2007 to 01/01/2015

Healthy Families:

MPQP1008 - 08/15/2012 to

03/01/2013 Healthy Kids: (KK

QI201, MPQP1008)

04/18/07; 02/20/08; 03/18/09; 04/21/10; 08/15/12; 08/20/14; 09/16/15; 10/19/16 to 12/01/16  
(Healthy Kids Program ended 12/01/2016)